PROPOSAL EVALUATION

Proposition 50, Chapter 8 Integrated Regional Water Management Planning Grant

PIN 4938 **Multiple Counties** COUNTY

APPLICANT Lower Tule River Irrigation District \$225,560 AMOUNT REQUESTED PROJECT TITLE Tule River Integrated Regional Water TOTAL PROJECT COST \$242,540

Management Plan

PROJECT DESCRIPTION

The Project consists of the tasks necessary to prepare and adopt IRWM Plan for the region within the valley floor portion of the Tule River watershed (region) that is feasible, equitable and economical and meets current IRWM Plan requirements. The IRWM Plan will be designed to address objectives and conflicts within the region regarding water supply, groundwater management, environmental resources and water quality. The Project will enlist regional stakeholder participation so that water management needs and obstacles are identified and considered, with efforts to consist of planning document assessment and coordination, regional water management strategy development and data collection and evaluation of water resources, environmental resources and socio-economic demographics. The procedures for evaluating the IRWM Plan's implementation will also be established through technical analysis, data management and assessments of benefits and impacts to the region.

WORK PLAN - Scoring will be based on whether the applicant has a detailed and specific work plan that adequately documents the proposal. Weighting factor is 3.

Score: 9

Comment: The work plan is not well defined. Some of the items within the work plan are described as preliminary or as "may have potential to." This creates some degree of uncertainty. Particularly because the applicant is establishing foundational pieces of the IRWMP as part of the work to be completed, process details are required to demonstrate that the work plan represents more than mirroring what was written in the Guidelines and PSP. However, the criteria that would be used to determine these strategies are not clearly defined. The budget and schedule are consistent, but hourly rates seem high. The contractor costs are not supported. Additionally, it is difficult to determine what costs make up the 7% funding match and where they fall in the budget. The schedule appears overly optimistic to have the plan adopted before January 1, 2007. Deliverables are clearly stated and will be made during and after the planning process is completed.

DESCRIPTION OF REGION - Scoring will be based on whether the applicant has presented a detailed and specific description that adequately documents the region. Weighting factor is 1.

Score: 3

Comment: While most applicants have already researched and documented their region, this applicant has listed that effort as a task to be performed in conjunction with IRWMP development without supporting that effort with need or process. Many of the criteria for Regional Description are not presented/known, but obtaining this information is incorporated into many of this proposal's work items. Regional water quality and quantity resources are not addressed. Current water related infrastructure of the region is only marginally supplied. The application lacks a good explanation for the basis for the region's boundaries, and the how or why these boundaries might change as the scope of work is implemented.

OBJECTIVES - Scoring will be based on whether the applicant has presented detailed and specific planning objectives. Weighting factor is 2.

Score: 4

Comment: The application falls significantly short in explaining the regional planning objectives. It appears that objectives stated relate more toward producing an IRWMP rather than true regional planning objectives. The applicant lists the statewide priorities that they will consider; however, the process as to how objectives will be determined is not fully explained. The only process piece included is that it will "utilize a public relations consultant/facilitator to work with the IRWM Plan Participants to establish the IRWM Plan objectives." It was not explained why only some of the statewide priorities listed in the guidelines warrant consideration. More points would have been given if preliminary objectives were given with some description of why they are preliminary plan objectives and then describe in detail the process that the applicant would use to modify, add, or delete objectives to develop the plan objectives.

INTEGRATION OF WATER MANAGEMENT STRATEGIES - Scoring will be based on whether the applicant has adequately documented how water management strategies will be integrated. Weighting factor is 2.

Comment: The application fails to demonstrate how water management strategies will be integrated. The work plan includes tasks to determine water management strategies for use in the IRWMP and establishment of integration. The work plan includes the minimum water management strategies to be considered, and shows the water management strategies currently employed. The work plan states the integration task will in general establish considerations for potential projects to be implemented. It is unclear what this statement means, and how that would ensure strategy integration. Examples given later in the work plan seem to be water storage and extraction type projects and do not seem to integrate other water management strategies. More points would have been awarded if the applicant presented a detailed process for selecting water management strategies and demonstrated a stronger ability/understanding of integrating separate strategies.

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IMPLEMENTATION - Scoring will be based on whether the applicant has adequately detailed plan implementation. Weighting factor is 2.

Score: 4

Comment: The application does not adequately detail/explain several of the required elements of how the IRWMP will be implemented after it is approved. There is no schedule for implementation beyond adoption, institutional structure to ensure implementation is not well defined, and mechanisms for monitoring the performance of the IRWMP implementation are not well defined. The work plan does include a section on IRWMP implementation which includes tasks for data and technical analysis, data management, determination of projects, plan performance, and coordination. The relationship between member agencies and how that relationship is conducive to regional management is unclear. The work plan states that IRWMP performance will be accomplished by review of performance data by the applicant; however, it does not state what that data might be and how it might be collected.

IMPACTS AND BENEFITS - Scoring will be based on whether the applicant has adequately presented and documented the impacts and benefits of the Plan. Weighting factor is 2.

Score: 4

Comment: The applicant states that Benefits and Impacts from implementation will be assessed by the applicant. The proposal mentions some possible impacts and benefits, but does not provide any analysis. The applicant also states that as part of the IRWMP's implementation performance review it will evaluate impacts as they are discovered. The adopted IRWMP should include a detailed analysis of all potential impacts prior to adoption. The applicant states that preparing this IRWMP will not require CEQA review and doesn't have a plan to comply with CEQA, except for doing CEQA documentation for each individual implementation project.

DATA AND TECHNICAL ANALYSIS - Scoring will be based on whether the applicant has presented detailed and specific data and technical analysis components of the proposal. Weighting factor is 1.

Comment: The applicant indicates that there is a minor amount of consolidated regional data. A work item is dedicated to gathering and summarizing data and technical studies to support the development of this IRWMP and address any data gaps; however, the applicant is not specific as to how this will be done. The proposal states "...specific methods and analysis will be identified and established to reflect specific projects." An objective of the IRWMP will be to assemble regional data to support the development of the IRWMP. No details are offered as to the type of data, how it will be collected, what is currently available, or who might have or already collected the data.

DATA MANAGEMENT - Scoring will be based on whether the applicant has presented detailed and specific data management procedures. Weighting factor is 1.

Score: 2

Comment: The applicant fails to convey a system for managing data. The application states "Standard requirements for data and graphic files will be established for use with proposed projects." Lack of details makes this an inadequate situation for data management. While there is a work item for development of a process to gather and manage data, the applicant should provide more detail about such a process would entail: i.e. how would existing data be evaluated for quality and consistency before being included in a database, would a database even be used, what form the data might be found in and how it would be processed, what types of data are needed to support the IRWMP development/implementation? Support of statewide data needs is not fully addressed. The applicant states "Project staff will also work with SWRCB to identify opportunities to support State wide data needs." This statement alone does not address the criteria.

STAKEHOLDER INVOLVEMENT - Scoring will be based on whether the applicant has adequately documented stakeholder involvement concerns. Weighting factor is 1.

Comment: Part I of the work plan includes work items that address processes for identifying stakeholders and developing mechanisms for stakeholder involvement. Part I will include identification of stakeholders, soliciting IRWMP participants, developing participation mechanisms (legal agreements), and IRWMP coordination and development. It is not clear, under the solicitation of IRWMP participants, who decides which entities should be solicited. There are letters of support for this project from 11 water agencies in the region. It is not clear that other stakeholders have been involved to this point in the process. The preliminary participant reconnaissance process occurs early in the IRWMP development, and it is not clear that additional stakeholders can be identified later in the process.

DISADVANTAGE COMMUNITIES - Scoring will be based on whether the applicant has adequately documented disadvantaged community concerns. Weighting factor is 1.

Score: 4

Comment: All communities in the region are disadvantaged and implementation of the IRWMP would benefit the DACs. Participation in the IRWMP development effort by the water agencies representing these communities was presented as the means for participation from of the DACs. However, the proposal does not address specific needs related to the water quality and quantity impacts of the DACs. Additionally, more information as to the location and characteristics of some of the smaller DACs mentioned could have been provided.

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RELATION TO LOCAL PLANNING - Scoring will be based on whether the applicant has adequately documented the Plan's relationship to local planning efforts. Weighting factor is 1.

Score: 2

Comment: This proposal lists eight local planning documents, but it is unclear on how these documents relate to the proposed IRWMP. More points would have been awarded if the applicant explained how the local plans would be used to develop the proposed IRWMP, how the IRWMP and local plans would work with one another, or included a detailed process to demonstrate how that would happen.

AGENCY COORDINATION - Scoring will be based on whether the applicant has adequately documented agency coordination issues. Weighting factor is 1.

Score: 2

Comment: The application states that it will facilitate communication and coordination with local, State and federal agencies, but gives no details other than it will include peer review of proposed projects. No specific agencies are mentioned. Local decision maker involvement appears to be limited to Part I of the work plan. It would seem that coordination and input from local decision makers should exist throughout the development and implementation of the IRWMP rather than only at the beginning of IRWMP development.

TOTAL SCORE: 46